# UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF WISCONSIN

In re:

Wisconsin & Milwaukee Hotel LLC,

Case No. 24-21743-gmh Chapter 11

Debtor.

# APRIL 2024 FEE STATEMENT OF RICHMAN & RICHMAN LLC AS COUNSEL TO DEBTOR

Applicant:	Richman & Richman LLC
Counsel for:	Wisconsin & Milwaukee Hotel LLC
Period for compensation and reimbursement:	April 9, 2024 to April 30, 2024
Amount of compensation sought as actual, reasonable, and necessary:	\$79,233.50
Amount of reimbursement expenses sought as actual, reasonable, and necessary:	\$2,173.10
Total interim approval requested:	\$81,406.60

Dated this 10th day of June 2024.

## RICHMAN & RICHMAN Attorneys for the Debtor

By: /s/ Michael P. Richman

Michael P. Richman Claire Ann Richman Eliza M. Reyes

122 W Washington Ave, Suite 850

Madison, WI 53703 Tel: (608) 630-899 Fax: (608) 630-8991 mrichman@RandR.law crichman@RandR.law ereyes@RandR.law

# Richman & Richman LLC

**INVOICE** 

Date: 06/10/2024

Invoice #875

122 W Washington Ave, Suite 850 Madison, WI 53703-2732

Wisconsin & Milwaukee Hotel LLC c/o Jackson Street Management LLC Attn: Mr. Edward G. Carow 731 N. Jackson Street, Suite 420, Milwaukee WI53202

## Wisconsin & Milwaukee Hotel LLC/-2024.00023

# **Chapter 11**

#### **Services**

Type	Date	Notes	Timekeeper	Quantity	Rate	Total
Service	04/10/2024	1106 - Misc Motions & Court Hearings: Research and review bankruptcy docket on similar case filed in Delaware for motions and pleadings, in support of preparing post- petition motions	DTF	0.80	\$195.00	\$156.00
Service	04/10/2024	1109 - Asset Analysis & Recovery: Legal research: Debtor's right to pursue appeal post-petition	JES	3.00	\$195.00	\$585.00
Service	04/10/2024	1106 - Misc Motions & Court Hearings: Emails w/client team re employee payments, cash management, and other strategic matters re first day motions (.2); t/conf w/F. DiCastri re cash collateral and related issues (.2); t/conf w/J. Herreman re various matters in process for first days (.3); prep of detailed email to client team re budget process for first days (.3); t/conf w/White Lodge re management agreement and associated issues and budget for first days (.8); t/conf w/R. Lannan re cash collateral motion (.1)	MPR	1.90	\$750.00	\$1,425.00
Service	04/10/2024	1108 - Employment, Billing & Compensation: Work on R&R employment app	MPR	0.40	\$750.00	\$300.00
Service	04/10/2024	1102 - Case Administration / US Trustee: Work on draft press release on the filing and effects on business (.3); email exhanges w/UST re schedule for first days, IDI and 341 mtg (.1); review research re ongoing tax litigation, automatic stay, and	MPR	0.90	\$750.00	\$675.00

		potential Lender claim issues (.3); email to client team re continuation of certain non-bankruptcy litigation and employment of professionals (.2)				
Service	04/10/2024	1108 - Employment, Billing & Compensation: Prepare, revise, and finalize Application to Employ Richman & Richman LLC as counsel for Wisconsin & Milwaukee Hotel, Declaration of Michael P. Richman in support of Application to Employ, Notice of Application, and proposed Order (3.2); prepare email to Mark Flaherty sending Application to Employ for his review and signature (.2).	EMR	3.40	\$450.00	\$1,530.00
Service	04/10/2024	1104 - DIP Financing / Cash Collateral: Prepare draft of motion for use of cash collateral.	EMR	1.20	\$450.00	\$540.00
Service	04/10/2024	1106 - Misc Motions & Court Hearings: Prepare motion for authority to pay prepetition wages to WMH employees.	EMR	1.50	\$450.00	\$675.00
Service	04/11/2024	1106 - Misc Motions & Court Hearings: Research and preserve additional motion briefs and filings from Delaware bankruptcy case in support of review and preparation of post-petition motions	DTF	1.30	\$195.00	\$253.50
Service	04/11/2024	1108 - Employment, Billing & Compensation: Prepare first day motions: employee wage motion (3.2); cash management motion (3.5); motion for expedited hearing (.8), proposed interim order for use of cash collateral (.8), Declaration of Mark Flaherty in Support of First Day Relief (1.5).	EMR	9.80	\$450.00	\$4,410.00
Service	04/11/2024	1102 - Case Administration / US Trustee: Additional emails w/UST re qs about IDI and 341 mtg schedule, and first day hearing schedule	MPR	0.20	\$750.00	\$150.00
Service	04/11/2024	1104 - DIP Financing / Cash Collateral: Work on cash collateral stip and motion (.9); call w/M. Flaherty re first day hearing work on emergency motion for cash collateral use and other first days (.4); review loan and related transaction docs for cash collateral motion and first day dec (1.7)	MPR	3.00	\$750.00	\$2,250.00
Service	04/11/2024	1106 - Misc Motions & Court Hearings: Work on motion to honor prepetition reservations, deposits and credit card commissions (.4); prep of internal team	MPR	2.80	\$750.00	\$2,100.00

		email re status of first days and other tasks to be performed (.2); emails w/White Lodge re credit card commissions and revenue usage, and other first day issues (.2); t/cs to Chambers and emails w/client and WL team re potential first day hearing schedule and related issues (.5); review and reply to WL email re payroll and budget matters (.5); all hands Teams mtg re budget and other first day issues, including WL team and outside counsel (1.0)				
Service	04/11/2024	1102 - Case Administration / US Trustee: Prepare Chapter 11 Case Timeline and Deadlines for administration of WMH Chapter 11 filing.	EMR	0.50	\$450.00	\$225.00
Service	04/12/2024	1106 - Misc Motions & Court Hearings: Review court procedures and rules on motions practice and confirm compliance in preparing and filing post-petition emergency motions (.5); review and confirm details, information and documentation in support of post-petition emergency motions (.8); prepare exhibit to employee wage motion including necessary redactions (.5)	DTF	1.80	\$195.00	\$351.00
Service	04/12/2024	1104 - DIP Financing / Cash Collateral: Various emails re budget questions for cash collateral motion (.2); further emails re cash collat budget w/Marriott counsel, client and WL teams (.5); review budget qs w/J. Herreman (.2); organize and prep emails to WL team re budget and cash collateral (.5)	MPR	1.40	\$750.00	\$1,050.00
Service	04/12/2024	1106 - Misc Motions & Court Hearings: Email to internal team re first days status (.1); work on employee wages motion (1.0); additional review of employee wages motion and prop order (.7); work on reservations and credit card motion (.1); attention to finalizing and filing motions (.3)	MPR	3.20	\$750.00	\$2,400.00
Service	04/12/2024	1102 - Case Administration / US Trustee: Additional emails w/UST re schedule for IDI and 3431 meetings	MPR	0.20	\$750.00	\$150.00
Service	04/12/2024	1106 - Misc Motions & Court Hearings: Continue preparing motion for authority to pay prepetition employee wages, including conducting email exchange with inhouse counsel of management company of WMH to obtain and confirm amounts for payroll to be paid.	EMR	2.00	\$450.00	\$900.00

Service 04/12/2024 1106 - Misc Motions & Court Hearings: Review statements for WMH/H depository accounts at Town Bank to prepare motion for authority to retain prepetition bank accounts and cash management system (.4); conduct email exchange with Jennifer Cordova and Attorney Jon Herreman regarding prepetition account balances (.3)  Service 04/12/2024 1106 - Misc Motions & Court Hearings: Prepare motion for authority to retain prepetition bank accounts.  Service 04/12/2024 1106 - Misc Motions & Court Hearings: Prepare revisions to Declaration of Mark Flaherty in Support of WMH's Requests for First Day Relief.  Service 04/12/2024 1106 - Misc Motions & Court Hearings: Continue preparing motion for authority to pay prepetition credit card commissions and honor prepetition reservations (1.0); receive and review emails from inhouse counsed of holefs management company for information on credit card commissions (2)  Service 04/13/2024 1104 - DIP Financing / Cash Collateral: Work on emergency cash collateral motion (1.3); prep of email to Lender counsed re consent for emergency elevator repeties (2)  Service 04/13/2024 1106 - Misc Motions & Court Hearings: Review loan docs for first day dec and other hearings (1.2); teams mitg wife Reyes and P. Spada and WIL team re credit card batching and commissions for reservations and consort for emergency levator repetition reservations and credit card commissions for reservations and deposits (2)  Service 04/13/2024 1102 - Debtor Meetings & Communications: Phone conference with hotel management company to obtain information on prepetition reservations and credit card commissions and caredit card commissions and pay prepetition reservations and commissions and commissions to the galaxy and provided by hotel management company							
Prepare motion for authority to retain prepetition cash management system and prepetition bank accounts.  Service 04/12/2024 1106 - Misc Motions & Court Hearings: Prepare revisions to Declaration of Mark Flainerty in Support of WMH's Requests for First Day Relief.  Service 04/12/2024 1106 - Misc Motions & Court Hearings: Continue preparing motion for authority to pay prepetition credit card commissions and honor prepetition reservations (1.0): receive and review emails from inhouse counsel of hotel's management company for information on credit card commissions (2)  Service 04/13/2024 1104 - DIP Financing / Cash Collateral: Work on emergency cash collateral motion (1.3); prep of email to Lender counsel re consent for emergency elevator repairs (2)  Service 04/13/2024 1106 - Misc Motions & Court Hearings: Review loan docs for first day dec and other hearings (1.2); teams mtg w/E Reyes and P. Spada and WL team re credit card batching and commissions for reservations motion (.6); emails re gs on customer reservations and deposits / cc motion (.6); emails re gs on customer reservations and credit card commissions for motion for authorization to honor prepetition reservations and credit card commissions (5).  Service 04/13/2024 1112 - Debtor Meetings & Communications: Phone conference with hotel management company to obtain information on prepetition reservations and credit card commissions for motion for authorization to honor prepetition reservations and credit card commissions (.5).  Service 04/13/2024 1106 - Misc Motions & Court Hearings: EMR 5.50 \$450.00 \$2,475.00 \$2,47	Service	04/12/2024	Review statements for WMH's depository accounts at Town Bank to prepare motion for authority to retain prepetition bank accounts and cash management system (.4); conduct email exchange with Jennifer Cordova and Attorney Jon Herreman	EMR	0.70	\$450.00	\$315.00
Prepare revisions to Declaration of Mark Flaherty in Support of WMH's Requests for First Day Relief.  Service 04/12/2024 1106 - Misc Motions & Court Hearings: Continue preparing motion for authority to pay prepetition credit card commissions and honor prepetition reservations (1.0); receive and review emails from inhouse counsel of hotel's management company for information on credit card commissions (.2)  Service 04/13/2024 1104 - DIP Financing / Cash Collateral: Work on emergency cash collateral motion (1.3); prep of email to Lender counsel re consent for emergency elevator repairs (.2)  Service 04/13/2024 1106 - Misc Motions & Court Hearings: Review loan docs for first day dec and other hearings (1.2); teams mtg w/E Reyes and P. Spada and WL team re credit card batching and commissions for reservations motion (.5); work on reservations motion (.6); emails re gs on customer reservations and deposits (.2)  Service 04/13/2024 1112 - Debtor Meetings & Communications: Phone conference with hotel management company to obtain information on prepetition reservations and credit card commissions (.2)  Service 04/13/2024 1112 - Debtor Meetings & Communications: Phone conference with hotel management company to obtain information on prepetition reservations and credit card commissions (.5).  Service 04/13/2024 1106 - Misc Motions & Court Hearings: Conduct legal research on honoring prepetition reservations and calculate commissions to be paid	Service	04/12/2024	Prepare motion for authority to retain prepetition cash management system and	EMR	2.50	\$450.00	\$1,125.00
Continue preparing motion for authority to pay prepetition credit card commissions and honor prepetition reservations (1.0); receive and review emails from inhouse counsel of hotel's management company for information on credit card commissions (.2)  Service 04/13/2024 1104 - DIP Financing / Cash Collateral: Work on emergency cash collateral motion (1.3); prep of email to Lender counsel re consent for emergency elevator repairs (.2)  Service 04/13/2024 1106 - Misc Motions & Court Hearings: Review loan docs for first day dec and other hearings (1.2); teams mtg w/E Reyes and P. Spada and WL team re credit card batching and commissions for reservations motion (.5); work on reservations/deposits/ cc motion (.6); emails re qs on customer reservations and deposits (.2)  Service 04/13/2024 1112 - Debtor Meetings & Communications: Phone conference with hotel management company to obtain information on prepetition reservations and credit card commissions for motion for authorization to honor prepetition reservations and credit card commissions (.5).  Service 04/13/2024 1106 - Misc Motions & Court Hearings: Conduct legal research on honoring prepetition reservations and calculate commissions to be paid	Service	04/12/2024	Prepare revisions to Declaration of Mark Flaherty in Support of WMH's Requests for	EMR	0.80	\$450.00	\$360.00
Work on emergency cash collateral motion (1.3); prep of email to Lender counsel re consent for emergency elevator repairs (.2)  Service 04/13/2024 1106 - Misc Motions & Court Hearings: Review loan docs for first day dec and other hearings (1.2); teams mtg w/E Reyes and P. Spada and WL team re credit card batching and commissions for reservations motion (.5); work on reservations/deposits/cc motion (.6); emails re qs on customer reservations and deposits (.2)  Service 04/13/2024 1112 - Debtor Meetings & EMR 0.50 \$450.00 \$225.00 Communications: Phone conference with hotel management company to obtain information on prepetition reservations and credit card commissions for motion for authorization to honor prepetition reservations and credit card commissions (.5).  Service 04/13/2024 1106 - Misc Motions & Court Hearings: Conduct legal research on honoring prepetition reservations and calculate commissions and commissions and calculate commissions to be paid	Service	04/12/2024	Continue preparing motion for authority to pay prepetition credit card commissions and honor prepetition reservations (1.0); receive and review emails from inhouse counsel of hotel's management company for information on credit card commissions	EMR	1.20	\$450.00	\$540.00
Review loan docs for first day dec and other hearings (1.2); teams mtg w/E Reyes and P. Spada and WL team re credit card batching and commissions for reservations motion (.5); work on reservations/deposits/cc motion (.6); emails re qs on customer reservations and deposits (.2)  Service 04/13/2024 1112 - Debtor Meetings & EMR 0.50 \$450.00 \$225.00 Communications: Phone conference with hotel management company to obtain information on prepetition reservations and credit card commissions for motion for authorization to honor prepetition reservations and pay prepetition commissions (.5).  Service 04/13/2024 1106 - Misc Motions & Court Hearings: Conduct legal research on honoring prepetition reservations and commissions and calculate commissions to be paid	Service	04/13/2024	Work on emergency cash collateral motion (1.3); prep of email to Lender counsel re	MPR	1.50	\$750.00	\$1,125.00
Communications: Phone conference with hotel management company to obtain information on prepetition reservations and credit card commissions for motion for authorization to honor prepetition reservations and pay prepetition commissions (.5).  Service 04/13/2024 1106 - Misc Motions & Court Hearings: EMR 5.50 \$450.00 \$2,475.00 Conduct legal research on honoring prepetition reservations (1.8); review schedule of reservations and commissions and calculate commissions to be paid	Service	04/13/2024	Review loan docs for first day dec and other hearings (1.2); teams mtg w/E Reyes and P. Spada and WL team re credit card batching and commissions for reservations motion (.5); work on reservations/deposits/cc motion (.6); emails re qs on customer	MPR	2.50	\$750.00	\$1,875.00
Conduct legal research on honoring prepetition reservations (1.8); review schedule of reservations and commissions and calculate commissions to be paid	Service	04/13/2024	Communications: Phone conference with hotel management company to obtain information on prepetition reservations and credit card commissions for motion for authorization to honor prepetition reservations and pay prepetition	EMR	0.50	\$450.00	\$225.00
	Service	04/13/2024	Conduct legal research on honoring prepetition reservations (1.8); review schedule of reservations and commissions and calculate commissions to be paid	EMR	5.50	\$450.00	\$2,475.00

		(.4); conduct legal research on payment of commissions to credit card issuers and (.8); continue preparing motion for authority to honor prepetition reservations and pay commissions (2.5).				
Service	04/13/2024	1106 - Misc Motions & Court Hearings: Prepare additional revisions to Declaration of Mark Flaherty.	EMR	0.80	\$450.00	\$360.00
Service	04/13/2024	1104 - DIP Financing / Cash Collateral: Prepare administrative expense budget for inclusion in motion for use of cash collateral.	EMR	0.40	\$450.00	\$180.00
Service	04/13/2024	1102 - Case Administration / US Trustee: Review Court's docket text order to review deadlines to file additional first day motions and declarations, and service of same.	EMR	0.20	\$450.00	\$90.00
Service	04/14/2024	1104 - DIP Financing / Cash Collateral: Work on cash collateral budget (.1); work on cash collateral motion (.8); emails re lender requests for further budget info (.2)	MPR	1.10	\$750.00	\$825.00
Service	04/14/2024	1106 - Misc Motions & Court Hearings: work on emergency reservations/deposits/ credit card motion and related emails (1.2); work on Flaherty dec in support of all first day motions (1.0); t/c w/M. Flaherty re same (.1); work on motion to expedite hearings (.2); finalizing first day motions and associated emails re status and info needed (.6); further t/conf w/M. Flaherty re declaration and planning for first day hearings (.4); attention to final filing details and various team emails re same (.5)	MPR	4.00	\$750.00	\$3,000.00
Service	04/14/2024	1104 - DIP Financing / Cash Collateral: Revise administrative expense budget to be included as exhibit in motion for use of cash collateral and WMH's cash flow and expense budgets for exhibits to same.	EMR	0.50	\$450.00	\$225.00
Service	04/14/2024	1106 - Misc Motions & Court Hearings: Prepare revisions to Motion for Expedited Hearing on WMH's requests for first day relief.	EMR	1.20	\$450.00	\$540.00
Service	04/14/2024	1106 - Misc Motions & Court Hearings: Prepare additional revisions to Declaration of Mark Flaherty.	EMR	1.50	\$450.00	\$675.00
Service	04/14/2024	1106 - Misc Motions & Court Hearings: Prepare additional revisions to motion for authority to honor prepetition reservations and pay credit card commissions.	EMR	1.30	\$450.00	\$585.00

Service	04/14/2024	1104 - DIP Financing / Cash Collateral: Prepare final revisions to Motion for Use of Cash Collateral.	EMR	0.80	\$450.00	\$360.00
Service	04/14/2024	1106 - Misc Motions & Court Hearings: Finalize Motion for Use of Cash Collateral, Motion to Honor Prepetition Reservations and Pay Credit Card Commissions, Motion for Expedited Hearing, and Declaration of Mark Flaherty for filing.	EMR	0.80	\$450.00	\$360.00
Service	04/15/2024	1106 - Misc Motions & Court Hearings: review and revise supplemental motion for deposits	CAR	0.30	\$575.00	\$172.50
Service	04/15/2024	1109 - Asset Analysis & Recovery: Legal research: Room revenue and 552(b) exceptions	KAH	2.10	\$195.00	\$409.50
Service	04/15/2024	1106 - Misc Motions & Court Hearings: Prepare all first day emergency motions for service on creditors	DTF	1.30	\$195.00	\$253.50
Service	04/15/2024	1106 - Misc Motions & Court Hearings: Prepare supplement to motion to honor reservations and deposits, with declaration of G. Kunesh and exhibits for court filing	DTF	0.70	\$195.00	\$136.50
Service	04/15/2024	1106 - Misc Motions & Court Hearings: Begin drafting proposed orders on emergency motions pursuant to court order and in preparation for pending hearing on emergency motions	DTF	0.80	\$195.00	\$156.00
Service	04/15/2024	1106 - Misc Motions & Court Hearings: Prep of email to WL team re details of reservation deposits for first day motion (.1); work on supplement to deposits motion w/additional details (.5); prep of dec in support of supplement to deposits motion (.5)	MPR	1.10	\$750.00	\$825.00
Service	04/15/2024	1104 - DIP Financing / Cash Collateral: Prep of response to DiCastri email re Lender position (.4); t/conf w/F. DiCastri re Lender position on cash collateral and related issues (.5); various emails to debtor and WL team re cash collateral issues (.4)	MPR	1.30	\$750.00	\$975.00
Service	04/15/2024	1106 - Misc Motions & Court Hearings: Prepare revisions to Supplement to Motion for Authority to Honor Prepetition Reservations and Declaration of Gary Kunesh in Support of Motion.	EMR	1.70	\$450.00	\$765.00

		Day Motons and Court's docket text order on hearing on First Day Motions.				
Service	04/16/2024	1106 - Misc Motions & Court Hearings: Revise and finalize all proposed orders on emergency motions pursuant to court order and in preparation for pending hearing on emergency motions, and prepare for court filings	DTF	1.80	\$195.00	\$351.00
Service	04/16/2024	1102 - Case Administration / US Trustee: video conference with MPR and Attorney L Steele regarding first day motions	CAR	0.40	\$575.00	\$230.00
Service	04/16/2024	1106 - Misc Motions & Court Hearings: Prepare supplement to emergency motion to honor prepetition reservation and deposits and pay credit card commissions, with declaration of G. Kunesh for service on creditors with certificate of service	DTF	0.30	\$195.00	\$58.50
Service	04/16/2024	1104 - DIP Financing / Cash Collateral: Emails w/WMH team re lender position on cash collateral (.2); prep of email to F. DiCastri on adequate protection (.3); additional WMH emails re cash collateral and negotiations (.1); prep of letter to J. Halfenger re status of cash collateral order (.2); review latest cash collateral order draft from lender and prep of related email to client team re same (.3); further work on cash collateral order, including additional emails w/F. DiCastri and prep of final interim agreed order (.8)	MPR	1.90	\$750.00	\$1,425.00
Service	04/16/2024	1102 - Case Administration / US Trustee: T/conf w/UST office re various questions on first day motions (.4); followup email w/ WL team (.2); followup t/c w/J. Cordova and M. Flaherty re same (.2)	MPR	0.80	\$750.00	\$600.00
Service	04/16/2024	1106 - Misc Motions & Court Hearings: Preps for first day hearings/witnesses (1.0); work on proposed orders for first day motions (other than cash collateral (1.2); t/ conf w/Marriott counsel re first days and overall status (.2)	MPR	2.40	\$750.00	\$1,800.00
Service	04/16/2024	1104 - DIP Financing / Cash Collateral: Revise proposed interim order granting Motion for Use of Cash Collateral.	EMR	0.50	\$450.00	\$225.00
Service	04/16/2024	1106 - Misc Motions & Court Hearings: Prepare, revise, and finalize proposed interim order granting motion for authority to pay prepetition wages, including review of updated payroll for upcoming pay period	EMR	1.20	\$450.00	\$540.00

		to update amount of payroll.				
Service	04/16/2024	1106 - Misc Motions & Court Hearings: Review and prepare revisions to draft proposed interim order granting motion for authority to continue using current cash management system.	EMR	0.80	\$450.00	\$360.00
Service	04/16/2024	1106 - Misc Motions & Court Hearings: Revise draft of proposed order granting authority to pay prepetition credit card commissions and honor prepetition reservations.	EMR	0.80	\$450.00	\$360.00
Service	04/16/2024	1104 - DIP Financing / Cash Collateral: Revise and finalize proposed interim agreed order for use of cash collateral.	EMR	0.40	\$450.00	\$180.00
Service	04/17/2024	1102 - Case Administration / US Trustee: Travel from Madison to Milwaukee recorded at 1/2 time incurred (.8); travel from Milwaukee to MKE recorded at 1/2 time incurred (.3)	MPR	1.10	\$750.00	\$825.00
Service	04/17/2024	1106 - Misc Motions & Court Hearings: Preps for first day hearings (.6); mtgs in Milwaukee w/B. Perkins, G. Kunesh, M. Flaherty, J. Cordova, and E. Reyes to discuss general operational issues and preps for first day hearings (2.5); appear/participate in bankruptcy court first day hearings (1.2); post-court meeting w/M. Flaherty, J. Herreman, J. Cordova, E. Reyes re followup tasks, strategies and other post-hearing issues (.5);	MPR	4.80	\$750.00	\$3,600.00
Service	04/17/2024	1112 - Debtor Meetings & Communications: Work on press release to emphasize ordinary course of business operations approved by Court	MPR	0.50	\$750.00	\$375.00
Service	04/17/2024	1106 - Misc Motions & Court Hearings: Represent WMH at hearing on first day motions.	EMR	1.00	\$450.00	\$450.00
Service	04/17/2024	1112 - Debtor Meetings & Communications: Conference with Mark Flaherty, Jennifer Cordova, and WL Team to prepare for hearing on WMH's first day motions.	EMR	3.00	\$450.00	\$1,350.00
Service	04/17/2024	1106 - Misc Motions & Court Hearings: Travel to and from Milwaukee for hearing on first day motions.	EMR	3.20	\$0.00	\$0.00
Service	04/18/2024	1106 - Misc Motions & Court Hearings: Draft motion and proposed order to extend	DTF	1.50	\$195.00	\$292.50

		time to file completion schedules				
Service (	04/18/2024	1106 - Misc Motions & Court Hearings: Draft motion and proposed order to redact exhibit to employee wage motion	DTF	0.70	\$195.00	\$136.50
Service (	04/18/2024	1102 - Case Administration / US Trustee: Review court order on scheduling (.1); prep of emails re bank account status and other post-first day hearing matters (.4); t/conf w/ C. Browns re bank accounts and related issues (.2)	MPR	0.70	\$750.00	\$525.00
Service (	04/18/2024	1102 - Case Administration / US Trustee: Review emails from WMH team regarding authorized depositories for DIP account (.2); review list of authorized depositories in the Eastern District of Wisconsin and prepare email to MPR forwarding same (.2)	EMR	0.40	\$450.00	\$180.00
Service (	04/18/2024	1103 - Petition, Schedules & Financials: Phone conference with Jennifer Cordova regarding information needed for completion schedules and statements.	EMR	0.30	\$450.00	\$135.00
Service (	04/18/2024	1106 - Misc Motions & Court Hearings: Prepare Notice of Motion and Motion to Grant Adequate Assurance for Utility Providers (2.2); phone conference with Gary Kunesh at White Lodging to obtain list of utility providers for Motion (.2).	EMR	2.40	\$450.00	\$1,080.00
Service (	04/18/2024	1106 - Misc Motions & Court Hearings: Prepare Motion for Authority to Pay Prepetition Sales Taxes and Proposed Order Granting Same.	EMR	2.70	\$450.00	\$1,215.00
Service (	04/18/2024	1106 - Misc Motions & Court Hearings: Review and prepare revisions to Motion to Extend Deadline to File Completion Schedules and Proposed Order.	EMR	0.80	\$450.00	\$360.00
Service (	04/19/2024	1106 - Misc Motions & Court Hearings: Revise, update, and finalize motion, notice, and proposed order re: utility deposits	DTF	1.80	\$195.00	\$351.00
Service (	04/19/2024	1106 - Misc Motions & Court Hearings: Revise and finalize motion and proposed order to redact exhibit to employee wage motion	DTF	0.30	\$195.00	\$58.50
Service (	04/19/2024	1106 - Misc Motions & Court Hearings: Revise and finalize motion to extend time to file completion schedules	DTF	0.50	\$195.00	\$97.50
Service (	04/19/2024	1102 - Case Administration / US Trustee:	MPR	0.50	\$750.00	\$375.00

		from court exhibit (.3); work on motion to extend time to file schedules (.2)				
Service	04/19/2024	1106 - Misc Motions & Court Hearings: Work on motion to provide adequate assurance to utilities (.6); work on related order (.1); further review and editing of utilities motion and order (.3)	MPR	1.00	\$750.00	\$750.00
Service	04/22/2024	1106 - Misc Motions & Court Hearings: Prepare utilities motion for service on creditors and all interested parties and confer with Stretto re: certificate of service	DTF	0.40	\$195.00	\$78.00
Service	04/22/2024	1103 - Petition, Schedules & Financials: Prepare email to clients re: reminder request for information for filing of Chapter 11 bankruptcy schedules	DTF	0.10	\$195.00	\$19.50
Service	04/22/2024	1102 - Case Administration / US Trustee: Emails re status of depository bank for DIP account, UST inquiries, basic post-first day operations and related matters, with client and WL teams (.5); further emails re developments and issues with bank accounts and operations (.5); emails to WL team re various pending operations matters including postpetition checks and bank accounts (.4)	MPR	1.40	\$750.00	\$1,050.00
Service	04/22/2024	1104 - DIP Financing / Cash Collateral: Prep of email to F. DiCastri re lender requests and cash collateral status (.2)	MPR	0.20	\$750.00	\$150.00
Service	04/23/2024	1106 - Misc Motions & Court Hearings: Review file including docket and court orders to determine status of all pending deadlines and ensure compliance with court orders	DTF	0.50	\$195.00	\$97.50
Service	04/23/2024	1103 - Petition, Schedules & Financials: Review file and client documents to ascertain details and status of all necessary documents for completion of bankruptcy schedules	DTF	0.30	\$195.00	\$58.50
Service	04/23/2024	1102 - Case Administration / US Trustee: Emails w/J. Cordova and debtor team re bank accounts and related matters (.3); t/ conf w/WL counsel C. Brown re bank accounts, check clearance and operationis matters (.3); emails w/P. Spada re same (.2)	MPR	0.80	\$750.00	\$600.00
Service	04/23/2024	1106 - Misc Motions & Court Hearings: Work on sales and use tax motion (.4); emails to client and WL teams re same (.2)	MPR	0.60	\$750.00	\$450.00

Service	04/23/2024	1103 - Petition, Schedules & Financials: Conduct email exchange with Jennifer Cordova regarding obtaining information for completion schedules.	EMR	0.40	\$450.00	\$180.00
Service	04/24/2024	1102 - Case Administration / US Trustee: Review notice from UST and Chapter 11 operating instructions with exhibits to determine all necessary documentation and requirements for initial debtor interview with UST, and prepare detailed memorandum re: same in preparation for meeting	DTF	1.00	\$195.00	\$195.00
Service	04/24/2024	1103 - Petition, Schedules & Financials: Conference with client re: status of information and documentation needed in order to prepare bankruptcy schedules (.2); review, preserve, and determine status of all additional documentation in support of preparing bankruptcy schedules (.5)	DTF	0.70	\$195.00	\$136.50
Service	04/24/2024	1106 - Misc Motions & Court Hearings: Revise and update draft motion authorizing payment of prepetition sales and use tax	DTF	0.80	\$195.00	\$156.00
Service	04/24/2024	1104 - DIP Financing / Cash Collateral: Emails w/client team re cash collateral status (.4)	MPR	0.40	\$750.00	\$300.00
Service	04/24/2024	1102 - Case Administration / US Trustee: Emails re various UST requirements and other preps for IDI meeting (.2)	MPR	0.20	\$750.00	\$150.00
Service	04/24/2024	1108 - Employment, Billing & Compensation: Work on supplemental rule 2014 declaration of connections	MPR	0.40	\$750.00	\$300.00
Service	04/24/2024	1106 - Misc Motions & Court Hearings: Prepare further revisions to and finalize motion for authority to pay prepetition sales and use taxes (1.8); prepare notice of motion for same (.3); prepare proposed order on motion (.4).	EMR	2.50	\$450.00	\$1,125.00
Service	04/24/2024	1108 - Employment, Billing & Compensation: Prepare proposed order granting Application to Employ Richman & Richman LLC as bankruptcy counsel for WMH.	EMR	0.50	\$450.00	\$225.00
Service	04/24/2024	1108 - Employment, Billing & Compensation: Prepare Supplement to Declaration of Michael P. Richman Pursuant to Bankruptcy Rule 2014 in further support of Application to Employ Richman & Richman as counsel for WMH.	EMR	1.40	\$450.00	\$630.00

Service	04/24/2024	1103 - Petition, Schedules & Financials: Phone conference with DTF and Jennifer Cordova to discuss obtaining information for schedules and statements (.3); continue preparing schedules with information received on outstanding debts (.3).	EMR	0.60	\$450.00	\$270.00
Service	04/24/2024	1108 - Employment, Billing & Compensation: prepare language for supplemental affidavit of disinterestedness regarding prior connections	CAR	0.50	\$575.00	\$287.50
Service	04/25/2024	1106 - Misc Motions & Court Hearings: Review recent motion filings and docket, to ensure compliance with service of pleadings and objection deadlines	DTF	0.20	\$195.00	\$39.00
Service	04/25/2024	1108 - Employment, Billing & Compensation: review and revise Supplemental Declaration of MPR for Application to Employ to include connections	CAR	0.50	\$575.00	\$287.50
Service	04/25/2024	1102 - Case Administration / US Trustee: Review file and documents from client including insurance and accounts information, and prepare all necessary documentation for initial debtor interview with UST (3.2); prepare email to UST with requested documentation (.1)	DTF	3.30	\$195.00	\$643.50
Service	04/25/2024	1103 - Petition, Schedules & Financials: Prepare email to clients for review and signatures of forms to provide to UST in advance of initial debtor interview	DTF	0.10	\$195.00	\$19.50
Service	04/25/2024	1102 - Case Administration / US Trustee: prepare IDI exhibits and phone conference with M Flaherty and J Cordova to prepare same (1.3); phone conference with M Flaherty and J Cordova to prepare for IDI and discuss Operating Instructions and Requirements (.3); represent client at IDI (1.0)	CAR	2.60	\$575.00	\$1,495.00
Service	04/25/2024	1102 - Case Administration / US Trustee: Attend initial debtor interview with UST	DTF	1.00	\$195.00	\$195.00
Service	04/25/2024	1103 - Petition, Schedules & Financials: Prepare a list of information needed for schedules and statements to be provided to White Lodging.	EMR	0.80	\$450.00	\$360.00
Service	04/25/2024	1112 - Debtor Meetings & Communications: T/conf w/M. Flaherty re status/strategy and related email (.4); call w/A. Tantleff of FTI re potential FA	MPR	2.30	\$750.00	\$1,725.00

		engagement (.1); mtg w/C. Richman re IDI materials; related emails w/client and WL teams re same (.3); prep of email to WL team re additional info needed for schedules (.2); IDI prep call w/M. Flaherty, J. Cordova and C. Richman (.3); IDI call among UST, C. Richman, M. Flaherty, J. Cordova, D. Fowle, B. Schieve and C. Nash (1.0)				
Service (	04/25/2024	1104 - DIP Financing / Cash Collateral: Review DiCastri email w/cash collateral proposal, redline proposal and prep of email re same to client team (.5); draft reply position email on cash collateral to F. DiCastri (.4); client team t/conf re open cash collateral issues (.6); revise cash collateral proposals and prep of email to F. DiCastri re same (1.0)	MPR	2.50	\$750.00	\$1,875.00
Service (	04/25/2024	1102 - Case Administration / US Trustee: Conduct email exchanges with Controller Jennifer Cordova to obtain information on insurance policies and accounts to prepare exhibits to UST packet (.3); review insurance policies to determine premiums and other information (.4).	EMR	0.70	\$450.00	\$315.00
Service (	04/26/2024	1103 - Petition, Schedules & Financials: Review and preserve additional client document re: vendor payments in support of preparing bankruptcy schedules	DTF	0.20	\$195.00	\$39.00
Service (	04/26/2024	1104 - DIP Financing / Cash Collateral: Emails w/lender counsel re status of cash collateral negotiations (.1); t/conf w/C. Brown re same (.2); review, redline latest lender cash collateral order proposal (.5); emails to client and WL teams assessing issues in same (.3); t/conf w/F. DiCastri re default and info provisions (.1); client team t/conf to discuss open issues on cash collateral order and agreement (.4); further redlines of lender proposal, prep of related email to F. DiCastri and other related emails to client and WL teams (1.0)	MPR	2.60	\$750.00	\$1,950.00
Service (	04/27/2024	1104 - DIP Financing / Cash Collateral: Review latest DiCastri email and turn of draft cash collateral order (.6); further emails w/Marriott counsel and WL team re same (.3)	MPR	0.90	\$750.00	\$675.00
Service (	04/28/2024	1104 - DIP Financing / Cash Collateral: review and reply to email from J. Cordova re cash collateral order issues (.4); email to F. DiCastri re status (.1)	MPR	0.50	\$750.00	\$375.00

Service	04/29/2024	1104 - DIP Financing / Cash Collateral: prep of letter to J. Halfenger re extension of interim cash collateral order and reset of hearing (.4); prep of email to F. DiCastri re same and pending issues (.2); t/conf w/M. Flaherty re cash collateral hearing schedule and status (.1); email exchanges w/C. Brown re WL concerns on cash collateral order (.2); further emails w/C. Brown re same and prep of language for order re good faith expenses (.2); work on additional cash collateral order edits (.2); review non-profl fee budget for cc order exhibit and prep of emails re questions on same (.3); prep of email to F. DiCastri w/ latest draft order (.2)	MPR	1.80	\$750.00	\$1,350.00
Service	04/29/2024	1102 - Case Administration / US Trustee: prep of email to client team re open issues and budget questions	MPR	0.30	\$750.00	\$225.00
Service	04/29/2024	1106 - Misc Motions & Court Hearings: review/revise final proposed orders on first day interim relief	MPR	0.20	\$750.00	\$150.00
Service	04/29/2024	1106 - Misc Motions & Court Hearings: Prepare proposed Final Order granting Employee Wage Motion.	EMR	0.80	\$450.00	\$360.00
Service	04/29/2024	1106 - Misc Motions & Court Hearings: Prepare proposed Final Order granting Motion to Maintain Prepetition Cash Management Procedures.	EMR	1.20	\$450.00	\$540.00
Service	04/29/2024	1106 - Misc Motions & Court Hearings: Prepare proposed Final Order granting Motion to Honor Prepetition Reservations and Pay Commissions.	EMR	0.80	\$450.00	\$360.00
Service	04/29/2024	1106 - Misc Motions & Court Hearings: Review proposed correspondence to Court regarding status of negotiations with secured lender on final order authorizing use of cash collateral.	EMR	0.20	\$450.00	\$90.00
Service	04/29/2024	1103 - Petition, Schedules & Financials: Continue preparing completion schedules and statements.	EMR	0.80	\$450.00	\$360.00
Service	04/30/2024	1106 - Misc Motions & Court Hearings: Review court's docket text entry and prior utility motions filings and prepare draft supplement to utilities motion to address service and notice to additional utilities providers	DTF	1.50	\$195.00	\$292.50
Service	04/30/2024	1106 - Misc Motions & Court Hearings:	MPR	0.20	\$750.00	\$150.00

		work on supp utilities motion				
Service	04/30/2024	1104 - DIP Financing / Cash Collateral: t/cs w/M. Flaherty re liquor distributor and temp employment agency cc budget issues (.2); emails w/F. DiCastri, C. Brown, J. Cordova re cash collateral and banking issues (.2); t/c w/C/ Brown re latest draft cc order and liquor/employee issues (.2); further emails re budget questions/items (.1)	MPR	0.70	\$750.00	\$525.00
Service	04/30/2024	1106 - Misc Motions & Court Hearings: Review and prepare revisions to drafts of Supplement to Motion for Continuation of Utility Service and Approval of Adequate Assurance of Payment to Utility Companies to finalize same.	EMR	1.50	\$450.00	\$675.00

**Quantity Subtotal** 

157.6

**Services Subtotal** 

\$79,233.50

### **Expenses**

Туре	Date	Notes	Quantity	Rate	Total
Expense	04/15/2024	Copy Expense: Stretto Printing/Copying Expense: Debtor's Emergency Motions for First Day Relief (Docs 15, 16, 19, 20); Declaration of Mark Flaherty (Doc 21); Motion to Expedite Hearing on First Day Motions (Doc 22)	1.00	\$988.20	\$988.20
Expense	04/15/2024	Postage Expense: Stretto Postage Expense: Debtor's Emergency Motions for First Day Relief (Docs 15, 16, 19, 20); Declaration of Mark Flaherty (Doc 21); Motion to Expedite Hearing on First Day Motions (Doc 22)	1.00	\$224.61	\$224.61
Expense	04/16/2024	Copy Expense: Stretto Printing/Copying Expense: Supplement to Debtor's Emergency Motion for Authority to Honor Prepetition Reservations and Deposits (Doc 25) and Declaration of Gary Kunesh (Doc 26)	1.00	\$85.05	\$85.05
Expense	04/16/2024	Postage Expense: Stretto Postage Expense: Supplement to Debtor's Emergency Motion for Authority to Honor Prepetition Reservations and Deposits (Doc 25) and Declaration of Gary Kunesh (Doc 26)	1.00	\$40.32	\$40.32
Expense	04/17/2024	Mileage: Roundtrip mileage for Attorneys Richman and Reyes to attend First Day Hearings at U.S. Courthouse, 517 E. Wisconsin Ave., Milwaukee, WI	192.00	\$0.67	\$128.64
Expense	04/19/2024	Chapter 11 Filing Fee: Filing fee for Motion to Redact.	1.00	\$28.00	\$28.00
Expense	04/19/2024	Copy Expense: Stretto Printing/Copying Expense:	1.00	\$18.90	\$18.90

		Amended Court Minutes and Order regarding Debtor's Emergency Motions for First Day Relief (Docs 15, 16, 19, 20)			
Expense	04/19/2024	Postage Expense: Stretto Postage Expense: Amended Court Minutes and Order regarding Debtor's Emergency Motions for First Day Relief (Docs 15, 16, 19, 20)	1.00	\$40.32	\$40.32
Expense	04/22/2024	Copy Expense: Stretto Printing/Copying Expense: Debtor's Motion for Order Pursuant to Sections 366 and 105 of the US Bankruptcy Code Prohibiting Utility Providers from Altering, Refusing or Discontinuing Services to the Debtor (Docs 56, 57, and 58)	1.00	\$207.90	\$207.90
Expense	04/22/2024	Postage Expense: Stretto Postage Expense: Debtor's Motion for Order Pursuant to Sections 366 and 105 of the US Bankruptcy Code Prohibiting Utility Providers from Altering, Refusing or Discontinuing Services to the Debtor (Docs 56, 57, and 58)	1.00	\$121.39	\$121.39
Expense	04/24/2024	Copy Expense: Stretto Printing/Copying Expense: Debtor's Motion for Order Pursuant to Sections 105(a), 363(b), 541, and 507(a)(8) of the Bankruptcy Code Authorizing Payment of Prepetition Sales and Use Taxes (Docs 73, 74)	1.00	\$90.00	\$90.00
Expense	04/24/2024	Postage Expense: Stretto Postage Expense: Debtor's Motion for Order Pursuant to Sections 105(a), 363(b), 541, and 507(a)(8) of the Bankruptcy Code Authorizing Payment of Prepetition Sales and Use Taxes (Docs 73, 74)	1.00	\$52.80	\$52.80
Expense	04/29/2024	Copy Expense: Stretto Printing/Copying Expense: Amended Court Minutes and Order - Debtor's Motion for Order Pursuant to Sections 366 and 105 of the US Bankruptcy Code Prohibiting Utility Providers from Altering, Refusing or Discontinuing Services to the Debtor (Docs 56, 57, 58)	1.00	\$39.60	\$39.60
Expense	04/29/2024	Postage Expense: Stretto Postage Expense: Amended Court Minutes and Order - Debtor's Motion for Order Pursuant to Sections 366 and 105 of the US Bankruptcy Code Prohibiting Utility Providers from Altering, Refusing or Discontinuing Services to the Debtor (Docs 56, 57, 58)	1.00	\$20.57	\$20.57
Expense	04/30/2024	Copy Expense: Stretto Printing/Copying Expense: Supplement to Debtor's Motion for Order Pursuant to Sections 366 and 105 of the US Bankruptcy Code Prohibiting Utility Providers from Altering, Refusing, or Discontinuing Services to the Debtor (Doc 85)	1.00	\$42.00	\$42.00
Expense	04/30/2024	Postage Expense: Stretto Postage Expense: Supplement to Debtor's Motion for Order Pursuant to Sections 366 and 105 of the US Bankruptcy Code Prohibiting Utility Providers from Altering, Refusing, or	1.00	\$44.80	\$44.80

#### Discontinuing Services to the Debtor (Doc 85)

**Expenses Subtotal** 

\$2,173.10

Time Keeper	Position	Quantity	Rate	Total
Kayla Holmes	Associate	2.1	\$195.00	\$409.50
Eliza Reyes	Associate	66.1	\$450.00	\$29,745.00
Eliza Reyes	Associate	3.2	\$0.00	\$0.00
Claire Richman	Partner	4.3	\$575.00	\$2,472.50
Michael Richman	Partner	55.2	\$750.00	\$41,400.00
James Soo	Associate	3.0	\$195.00	\$585.00
David Fowle	Paralegal	23.7	\$195.00	\$4,621.50

**Quantity Total** 

157.6

Subtotal

\$81,406.60

Total \$81,406.60

## **Statement of Account**

Outstanding Balance \$0.00

**New Charges** + \$81,406.60

Payments Received \$0.00 ) - (

**Total Amount Outstanding** \$81,406.60

#### Richman & Richman LLC Trust - Advanced Fees

Date	Type	Notes	Matter	Receipts	Payments	Balance
04/06/2024		Advance Fee Deposit	Wisconsin & Milwaukee Hotel LLC/-2024.00023		\$25,000.00	\$25,000.00
04/09/2024			Wisconsin & Milwaukee Hotel LLC/-2024.00023		\$23,000.00	\$48,000.00
04/09/2024		Payment for invoice #724	Wisconsin & Milwaukee Hotel LLC/-2024.00023	\$16,174.00		\$31,826.00

Richman & Richman LLC Trust - Advanced Fees Balance

\$31,826.00

ALL BILLS DUE & PAYABLE UPON RECEIPT UNLESS ARRANGEMENTS ARE MADE WITH COUNSEL.

Please make all amounts payable to: Richman & Richman LLC

Check/Cash Payments: Mail to 122 W. Washington Ave., Suite 850, Madison, WI 53703-2732

Credit Card Payments: Via LawPay at www.RandR.law (or attached link)

Wire Instructions: Account Name: Richman & Richman LLC (General Checking)

Account Address: 122 W. Washington Ave., Suite 850, Madison, WI 53703-2732

Bank Name and Address: BMO Harris Bank

ABA: 071025661 SWIFT Code HATRUS44 Acct No. 4838178298

Please pay within 30 days.